

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Technology Transitions)	GN Docket No. 13-5
)	
AT&T Petition to Launch a Proceeding)	GN Docket No. 12-353
Concerning the TDM-to-IP Transition)	

To: Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Comment Filed by: Barbara A. Li Santi, Ph. D.
3930 Patterson Ave
Oakland, CA 94619
barbara@mills.edu
510-530-3714

March 31, 2014

State of California

Alameda County

I, Barbara A. Li Santi, attest that my statements are true to the best of my knowledge.

Comment round for FCC GN Docket No. 12-353 and GN Docket No. 13-5.

1. My name is Barbara A. Li Santi. My address is 3930 Patterson Ave, Oakland, CA 94619.
2. I am a Professor of Mathematics and Computer Science at Mills College.
3. This proposed trial should be held in abeyance until FCC Docket ET-13-84 reviewing outdated FCC RF limits is completed. The Department of Interior is correct and is far from alone in questioning FCC standards
(http://www.ntia.doc.gov/files/ntia/us_doi_comments.pdf)
4. Customers sensitive to the RF radiation emissions of wireless technology, classified as a carcinogen by the EPA in 1990, may be unable to tolerate cell phones or their charging stations. If landlines are taken from them, these most vulnerable customers are left without communication abilities. An estimated 3-30% of the population is denied access to telephone service by reason of health.
5. The AT&T trial proposed in this matter may be used, or misused, to remove traditional copper landlines from customers wishing to keep traditional copper landlines, this proposal disenfranchises telephone users by denying choice in the means by which essential services are provided. The FCC should not be aiding and abetting such activities.
6. Through two earthquakes here in California and blackouts in New York City, my traditional landline telephone maintained communication ability. Cell phones failed.
 - a. Copper landlines do not require local power or batteries to call for help;
 - b. Wireless communication requires a power source or a charged battery;
 - c. Alarm systems and medical devices dependent on wireless technology are prone to failure when power and batteries run out.
7. Verification of caller's locale is certain with a landline, but may be impossible to verify when a cell phone is used.
8. If customers desire secure environments from which to make their telephone calls, they deserve this option. Default Wi-Fi and cell phones provide the means to track and hear conversations held in proximity of those cell phones without the knowledge of those

same customers.

9. Interference in implanted medical devices has been documented. Landlines do not cause these problems.
10. Lack of bandwidth, competition for certain widths, or interference from other RF/EMF sources can disrupt and disable cellular communications. Issues of interconnection and disconnection can be detrimental to cellular service. Political disputes and market rate battles over unregulated matters should not be means to disable public communications. Landlines work consistently; maintain this asset!
11. Over- or under-current electrical conditions can disable cellular communications, rendering cell phone useless in time of need.
12. The root cause of AT&T's efforts to eliminate existing landline service is profit-driven. Public benefit should take precedence over corporate gain.

I urge the FCC to act on this matter with adherence to consumer's rights and protection. The public deserves secure, safe and reliable telephone service. To the extent that these conditions are abridged, any course of action is wrongful and causes public harm. Keep traditional landlines available and functioning as they currently function.

Respectfully submitted by

Barbara A. Li Santi

3930 Patterson Ave

Oakland, CA 94619

March 31, 2014

A handwritten signature in black ink that reads "Barbara A. Li Santi". The signature is written in a cursive, flowing style.